

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED NATIONAL SPECIALTY INSURANCE  
COMPANY,

Docket No.: 07-CV-10934  
(PKC) (THK)

Plaintiff,

**NOTICE OF MOTION FOR  
DEFAULT**

-against-

1854 MONROE AVENUE H.D.F.C. and EULALIA  
BALAGUER,

Defendants.


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**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Adam I. Kleinberg, dated March 10, 2008, and upon all prior pleadings and proceedings, the undersigned will move this Court, before the Honorable P. Kevin Castel, on a date and time to be designated by the Court, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, for an order granting plaintiff, UNITED NATIONAL SPECIALTY INSURANCE COMPANY, a default judgment as against defendant 1854 MONROE AVENUE H.D.F.C., pursuant to Rule 55 of the Federal Rules of Civil Procedure, declaring that UNITED NATIONAL SPECIALTY INSURANCE COMPANY is not obligated to defend or indemnify defendant 1854 MONROE AVENUE H.D.F.C. in the action entitled *Eulalia Balaguer v. 1854 Monroe Avenue Housing Development Fund Corporation*, Index Number 15713/07, in the Supreme Court of the State of New York, Bronx County, on the ground that defendant has failed to timely answer and/or otherwise move with respect to the

complaint in this action, and for such other and further relief as this Court deems just, equitable, and proper.

Dated: Mineola, New York  
March 17, 2008

MIRANDA SOKOLOFF SAMBURSKY  
SLONE VERVENIOTIS LLP  
Attorneys for Plaintiff  
**UNITED NATIONAL SPECIALTY  
INSURANCE COMPANY**

By:   
Adam I. Kleinberg (AIK-0468)  
240 Mineola Boulevard  
The Esposito Building  
Mineola, New York 11501  
(516) 741-7676  
Our File No.: 07-544

TO: 1854 Monroe Avenue H.D.F.C.  
c/o Monica Acevedo  
Non-Appearing Defendant  
1854 Monroe Avenue  
Bronx, New York 10457

Michael C. Beatty  
FELDMAN, KRONFELD & BEATTY  
Attorneys for the Defendant Eulalia Balaguer  
42 Broadway, 19<sup>th</sup> Floor  
New York, NY 10004  
212-425-0230